

REMARKS

Applicants request reconsideration and allowance of the present application in view of the following amendments to the claims and remarks.

Upon entry of the foregoing amendments, claims 1-9, 12-26 and 28-44 are pending. Claims 1, 28, and 29 are independent claims.

Claims 1, 9-11, 16, 18-20, 25, and 28-41 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,792,145 (“Gay”) in view of the U.S. Publication US 2006/0167772 (“Zilberman”). Claims 2-8, 12-15, 17, 21-24 and 26-27 stand rejected as being unpatentable under 35 U.S.C. § 103(a) over Gay and Zilberman, and further in view of U.S. Publication 2004/0230892 (“Horton”).

The amendments to independent claims 1, 28 and 29 distinguish over Gay, Zilberman and Horton, alone in combination. For example, Applicants find no teaching in Gay, Zilberman or Horton of a processor that provides “as an output said numerical tabular delta data, said text tabular delta data, and said deletions data,” as recited in claim 1 (and similarly recited in claims 28 and 29).

As acknowledged by the Examiner on page 20 of the July 2, 2007 Office Action, Gay does not teach (a user interface for) delivering at least one of additions, deletions, substitutions, and text/tabular data. In the July 2, 2007 Office Action, Applicants find no indication that the Examiner believes that Zilberman discloses such features or compensates for the deficiencies of Gay in this regard.

On page 23 of the July 2, 2007 Office Action, the Examiner relies on Horton to compensate for certain deficiencies of Gay and Zilberman. However, on page 23 of the Office Action, the Examiner also appears to appreciate that Horton does not disclose displaying additions data, deletions data, **and** substitutions data, insofar as the Examiner states that “although claim 15 recites displaying additions, deletions, and substitutions data in a variety of manners, claim 11 only requires that one of these be displayed.”

Applicants have reviewed Horton, and do not find that Horton discloses deletions data, as recited in claim 1 (and claims 28 and 29). Instead, Applicants find that Horton discloses that changes (or revisions) to various versions of a document are shown by using *italics* to indicate certain change(s). However, Horton's use of italics does not show the particular text that has been deleted between various versions of a document. For example, the Original version of a document shown in Figure 1 of Horton contains "Independent of how headquarters has provided...". This text is replaced in Draft 1 by "*Whether or not headquarters has been successful in providing...*". (Italicized text is provided by and shown in Draft 1 of Horton.) A user reviewing Draft 1 of Horton (as exemplified in Figure 1 thereof) would not know that the "Independent of how headquarters has provided..." language, or any other language, was included in the Original version, and was deleted from the Original version in Draft 1. In view of the foregoing, Applicants submit that claim 1 recites features that are not found in Gay, Zilberman and Horton, alone in combination.

Applicants have added dependent claims 42-44 to further distinguish over Gay, Zilberman or Horton. For example, claim 44 (in combination with claims 1 and 15 from which claim 44 depends) recites that deletions data that are chronicled on the user interface are in substantial horizontal alignment. This feature of the claimed invention is shown, for example, in Figure 5, which is a Form 10-Q Delta Report that has data corresponding to the September 29, 2002 date on the left side of divider 50, and data corresponding to the June 30, 2002 date on the right side of divider 50. More particularly, this feature of the claimed invention is shown in Figure 5 by deletions data numerical indicator 47, and the associated indicia (the x with a box around the x). This feature of the claimed invention is also shown in the left hand side of divider 50 by the numerals 82 and the associated indicia (the two x's with respective box around the x's).

Claims 43 and 44 recite further features that are also not taught or suggested by Gay, Zilberman and Horton, alone in combination.

Conclusion

Applicants respectfully submit that, as described above, the cited prior art does not show or suggest the combination of features recited in the claims. Applicants do not concede that the cited prior art shows any of the elements recited in the claims. However, Applicants have provided specific examples of elements in the claims that are clearly not present in the cited prior art.

Applicants strongly emphasize that one reviewing the prosecution history should not interpret any of the examples Applicants have described herein in connection with distinguishing over the prior art as limiting to those specific features in isolation. Rather, Applicants assert that it is the combination of elements recited in each of the claims, when each claim is interpreted as a whole, that is patentable. Applicants have emphasized certain features in the claims as clearly not present in the prior art, as discussed above. However, Applicants do not concede that other features in the claims are also not missing in the prior art. Rather, for the sake of simplicity, Applicants are providing examples of why each of the claims described above are distinguishable over the cited prior art.

For the reasons advanced above, issuance of a Notice of Allowance is respectfully requested.

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Respectfully submitted,

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